

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**GRADY O. HUMPHREYS, et al., vs.
A.O. SMITH ELECTRICAL
PRODUCTS COMPANY, et al.**

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

vs.

**CIVIL ACTION NO.
2:07-CV-607-WKW**

**ASBESTOS DEFENDANTS:
A. O. SMITH ELECTRICAL PRODUCTS
COMPANY, a division of A.O. SMITH
CORPORATION, et al.,**

Defendants.

_____/

JOINDER AND ADOPTION IN MOTION FOR PARTIAL SUMMARY JUDGMENT

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., Maremont Corporation and Bayer Cropscience, Inc. f/k/a Aventis Cropscience USA, Inc. (f/k/a Rhone Poulenc Ag Company, Inc. f/k/a Rhone Poulenc, Inc., f/k/a Union Carbide Agricultural Products, Inc. f/k/a Amchem Products, Inc., A Successor To Benjamin Foster Company) and hereby join in and adopt as though fully set forth Motion for Partial Summary Judgment filed herein by Borg-Warner, Extenco, Inc. and the Marley-Wylain Company on April 4, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., Maremont Corporation and Bayer Cropscience, Inc. f/k/a Aventis Cropscience USA, Inc. (f/k/a Rhone Poulenc Ag Company, Inc. f/k/a Rhone Poulenc, Inc., f/k/a Union Carbide Agricultural Products, Inc. f/k/a Amchem Products, Inc., A Successor To Benjamin Foster Company) respectfully request this Honorable Court to grant Motion for Partial Summary Judgment filed herein by Borg-Warner, Exteco, Inc. and the Marley-Wylain Company and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 23rd day of April, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher (FLE 019)

AL Bar No. ASB-1485-C19E

Elizabeth B. Padgett (PAD015)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.
Law Offices of G. Patterson Keahey, P.C.

One Independence Plaza, Suite 612
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This 23rd day of April, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher

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